

# START

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## Meeting Minutes Transmittal - Approval

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
740 STVCN, RM 1600  
Richland, Washington

Meeting Held February 17, 1993  
From 10:00 am to 11:00 am

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

*Randall N. Krekel* Date: 3-17-93  
Randall N. Krekel, Unit Manager, RL

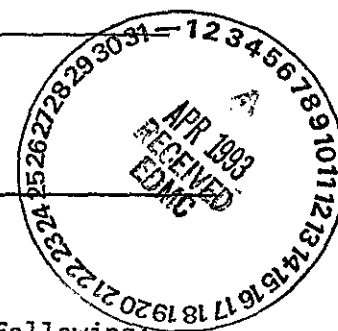
Not present. Date: \_\_\_\_\_  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

*Jeanne J. Wallace* Date: 3/17/93  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

*Fred A. Ruck III* Date: 3/17/93  
Fred A. Ruck III, Contractor Representative, WHC

Not present. Date: \_\_\_\_\_  
J. A. (Mickey) Seamans, Contractor Representative, WHC



Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Handout (Closure Plan Status, Kennewick Responsibilities)
- Attachment 6 - Handout (Questions on Ecology NOD Comments)

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## Attachment 2

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
740 STVCN, RM 1600  
Richland, Washington

Meeting Held February 17, 1993  
From 10:00 a.m. to 11:00 am

### Summary of Discussion and Commitments/Agreements

#### 1. Status of NOD cycle:

The status of the NODs were discussed. RL (R.N. Krekel) stated that the Ecology NOD Comments were being addressed and that responses would be issued to Ecology per the Tri-Party Agreement RCRA Closure Plan process flowchart.

#### 2. Discuss new business:

This is the initial Unit Manager Meeting for the 4843 Alkali Metal Storage Facility Closure Plan.

Ecology (J.J. Wallace) distributed a table (attachment 5) listing the type, unit manager, status and upcoming deadlines for several closure plans, including the 4843 Alkali Metal Storage Facility closure plan.

Ecology, RL and WHC reached a consensus that the NOD response discussions could be staggered, e.g., by a one month interval, to avoid concentrated staff work loads. WHC (F.A. Ruck) took an action to provide a schedule reflecting this (Action 2-17-93: 1).

Ecology (L.E. Russell) requested a list of the people in charge of closure plans. RL (R.N. Krekel) stated that he and R.G. McLeod were the RL Unit Managers representing RCRA closures. WHC (F.A. Ruck) took an action to provide a list of WHC lead personnel at a later date (Action 2-17-93: 2).

Ecology (L.E. Russell) requested clarification regarding chain-of-communication for closure plan/facility discussions. RL replied that all official communication should be directed toward them, or that RL must be apprised of the substance of direct Ecology-contractor communication.

WHC (J.G. Adler) requested clarification on two of the Ecology NOD Comments (#24 and #25). A handout (attachment 6) with NOD Comments # 24, 25, 14, and 15 was distributed. Specifically, it was asked if Comments #24 and #25 addresses both action levels and the composition of spilled wastes by reference to NOD Comment #14, or if they (Comments #24 and #25) are intended to address only action levels as in Comment #15. Ecology (Jeanne J. Wallace) stated that Comments #24 and #25 address





Attachment 5

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
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Richland, Washington

Meeting Held February 17, 1993  
From 10:00 a.m. to 11:00 am

TITLE - Closure Plan Status, Kennewick Responsibilities

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Attachment 4

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
740 STVCN, RM 1600  
Richland, Washington

Meeting Held February 17, 1993  
From 10:00 a.m. to 11:00 am

Action Items

<u>Action Item #</u>		<u>Description</u>
02-17-93: 1	OPEN	WHC will provide a schedule that accommodates a staggering of dates for resolving NOD responses for the Ashpit, 218-E-8, HPADS, Hexone, an 4843 closure plans (F.A. Ruck).
02-17-93: 2	OPEN	WHC will prepare a list of WHC lead personnel for specific closure plans (F.A. Ruck).

**Closure Plan Status  
Kennewick Responsibilities  
February 16, 1993**

UNIT	TYPE	UNIT MANAGER	STATUS	UPCOMING
4843 Alkali Metal Storage Facility	Building	Jeanne Wallace	Submitted 6/90. First NOD issued 12/9/92.	NOD expected response 3/93.
Hanford Patrol Academy Demolition Site	Treatment Pit	Melodie Selby	Submitted 11/30/92. First NOD scheduled for 2/28/93 issuance.	NOD expected response 5/93.
Hexone Storage and Treatment Facility	Equipment and Tanks	Jeanne Wallace	Submitted 11/30/92. First NOD scheduled for 2/28/93 issuance.	NOD expected response 5/93.
218 E-8 Borrow Pit Demolition Site.	Treatment Pit	Jeanne Wallace	Submitted 11/30/92. First NOD scheduled for 2/28/93 issuance.	NOD expected response 5/93.
200W Ash Pit Demolition Site	Treatment Pit	Jeanne Wallace	Submitted 11/30/92. First NOD scheduled for 2/28/93 issuance.	NOD expected response 5/93.
100-D Ponds	Pond	Jeanne Wallace	Scheduled to be submitted 2/28/93.	Pending submission of Plan.
Simulated High Level Liquid Slurry Treatment/Storage	Storage Pads	Unassigned	Submitted 6/90. No NOD issued to date.	Review pending.
300 Area Waste Acid Treatment System	Building	Unassigned	Submitted 6/29/90. First NOD issued	Review pending.
Purex	Building	Unassigned	Pending Closure decision.	



Attachment 6

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
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Richland, Washington

Meeting Held February 17, 1993  
From 10:00 a.m. to 11:00 am

TITLE - Questions on Ecology NOD Comments

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## QUESTIONS ON ECOLOGY NOD COMMENTS

24. 6-2/11. Action levels are not adequately defined. See comment number 14.
25. 6-2/33-35. Action levels are not adequately defined. Compliance with regulatory requirements is not discussed, nor is the wipe sample method appropriately defined, referenced or adequately explained.

See comment regarding 14.

14. 4-2/23. There is question about the actual composition of spilled waste, once reacted with its ambient environment. The text states "Carbonates are the only products considered to be produced from the reaction of the metal wastes with air." Support for this conclusion is not provided. This determination is contradicted by spill reports and later sections of the closure plan. One of the spill reports submitted with the closure plan states that Sodium Hydroxide (NaOH) was formed when the waste reacted with moisture in the atmosphere. Also, during a walk-through of the unit, it was again stated that NaOH was formed when wastes were spilled.

Discuss the chemical/physical properties that govern the outcome of the reacting. Justify not considering other potential products. Provide supporting facts, references and/or analytical records. See previous comment.

15. 6-1/18. Ambiguous terms such as, "potentially dangerous" and "action levels" are not appropriately defined for the function of this document. The removal or decontamination of waste residues, equipment, soils, or other materials contaminated with dangerous waste or dangerous waste residue must not exceed background environmental levels for listed or characteristic wastes or designation limits for state only waste (WAC 173-303-610(2)(b)).

Modify text to include background as the clean closure performance standard. Replace ambiguous terms, or define them in reference to the regulation cited above. Citations of health-based standards must be changed to background. Correlate the term "action level" with the clean closure requirements.

Distribution:

J. G. Adler	WHC	H6-23
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
D. L. Duncan	EPA	HW-106
G. D. Forehand	WHC	B2-35
R. N. Krekel	RL	A5-15
S. J. Lijek	GSSC	A4-35
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
R. C. Sorensen	RL	A6-55
J. J. Wallace	Ecology - Kennewick	

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EDMC, WHC (H6-08)]

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Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail  
Stop HW-074

Please send comments on distribution list to Kym D. Tarter (H6-23),  
(509) 376-4701.

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